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6 FRESNO COMMUNITY HOSPITAL AND
6 MEDICAL CENTER d/b/a/ COMMUNITY
7 MEDICAL CENTERS

8 *(Additional Counsel Listed on Next Page)*

9

10 **UNITED STATES DISTRICT COURT**
11 **EASTERN DISTRICT OF CALIFORNIA**

12 RAGINA BELL, individually and on
13 behalf of all other similarly situated,

14 Plaintiff,

15 v.

16 COMMUNITY MEDICAL CENTERS;
17 and DOES 1-100, Inclusive,

18 Defendants.

19 Case No.: 2:20-cv-02500-WBS-DS

20 **STIPULATION AND ORDER TO
21 EXTEND TIME TO RESPOND TO
22 PLAINTIFF'S FIRST AMENDED
23 CLASS ACTION COMPLAINT**

24 Current Response Due: Disputed
25 New Response Due: 06/18/2021

26 Action Filed: 10/27/2020
27 Removal Date: 12/17/2020
28 FAC Filed: 04/20/2021

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21 *Attorneys for Plaintiff*
22 RAGINA BELL

1 IT IS HEREBY STIPULATED AND AGREED, by and between RAGINA
2 BELL (“Plaintiff”) and FRESNO COMMUNITY HOSPITAL AND MEDICAL
3 CENTER d/b/a/ COMMUNITY MEDICAL CENTERS (“Community Medical
4 Centers,” and together with Plaintiff, the “Parties”), by and through their respective
5 attorneys, and subject to Court approval, that Community Medical Centers shall
6 have an extension of time to respond to Plaintiff’s First Amended Class Action
7 Complaint, up to and including June 18, 2021, without prejudice to seek further
8 extension upon written agreement.

9 *Whereas*, on October 27, 2020, Plaintiff filed this action in the Superior
10 Court of the State of California for the County of Sacramento;

11 *Whereas*, on December 17, 2020, former defendant Blackbaud, Inc.
12 (“Blackbaud”) removed the action to this Court;

13 *Whereas*, that same day, on December 17, 2020, Plaintiff voluntarily
14 dismissed Blackbaud from the case;

15 *Whereas*, Plaintiff did not serve defendant Community Medical Centers with
16 a copy of the initial complaint;

17 *Whereas*, on April 20, 2021, Plaintiff filed her First Amended Class Action
18 Complaint, and emailed a copy to counsel for Community Medical Centers;

19 *Whereas*, the Parties disagree about whether or not this was effective service,
20 but have agreed to resolve this disagreement: Community Medical Centers agrees
21 that service of the First Amended Class Action Complaint was effective as of May
22 10, 2021, and Plaintiff agrees that Community Medical Centers’ response to
23 Plaintiff’s First Amended Class Action Complaint shall be due June 18, 2021; and

24 *Whereas*, the Parties have not previously requested or obtained any extension
25 of time for Community Medical Centers to respond to the First Amended Class
26 Action Complaint.

27 Based on the facts above and the Parties’ agreement, it is hereby stipulated
28 pursuant to Eastern District of California Local Rule 144, and subject to Court

1 approval, that Defendant may have up to and including June 18, 2021 to respond to
2 the First Amended Complaint.

3 **IT IS SO STIPULATED.**

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5
6 Dated: May 19, 2021

BAKER & HOSTETLER LLP

7 By: /s/ Teresa C. Chow
8 Teresa C. Chow

9 *Attorneys for Defendant*
10 FRESNO COMMUNITY HOSPITAL AND
MEDICAL CENTER d/b/a/ COMMUNITY
MEDICAL CENTERS

11
12 Dated: May 18, 2021

CROSNER LEGAL, P.C.

13
14 /s/ Chad A. Saunders
15 By: (as authorized on May 19, 2021)
16 Zachary M. Crosner, Esq.
Blake R. Jones, Esq.
Chad A. Saunders, Esq.
Michael R. Crosner, Esq.

17 *Attorneys for Plaintiff*
18 RAGINA BELL

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ORDER

The Court, having read and considered the Parties' Stipulation to Extend Time to Respond to Plaintiff's First Amended Class Action Complaint, and for good cause appearing, **HEREBY ORDERS** that Community Medical Centers may have up to and including June 18, 2021 to respond to the First Amended Class Action Complaint.

The Scheduling Conference is continued to September 13, 2021 at 1:30 p.m. A joint status report shall be filed no later than August 30, 2021.

IT IS SO ORDERED.

Dated: May 21, 2021

William H. Shubert

WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE